



487761

State Office Building
350 Ottawa Avenue, N.W.
Grand Rapids, Michigan 49503

July 22, 1980

Mr. Keith Patterson
Manager, Industrial Engineering
TRW-Portland
Michigan Division
Portland, Michigan 48875

Dear Mr. Patterson:

This will confirm that an inspection of your facility was conducted on July 17, 1980. The purpose of this visit was to determine progress made toward upgrading oil storage practices, and to investigate a complaint of past dumping practices at the plant. The following is a summary of this inspection and our request for further work:

1. The company has provided better control of drummed materials since our last visit. The final inside storage facility for drummed liquid materials will be completed by November 1980. Only non-fluid greases will be stored on the outside pad after that date.
2. Only empty, washed drums are stored outside in uncontained areas.
3. Oil stains on and off the pad at Building #8 indicate that better procedures are required for oily parts handling. We require that all or a portion of this pad be diked as a solution to this runoff problem. Plans for this diking should be submitted by August 31, 1980.
4. Any oil-stained soil should be excavated and replaced with clean sand. The company now maintains a sand pile for this purpose.
5. The complaint that involved an old oil sludge pit on the southeast corner of the plant must be investigated for:
 - a. Presence of PCB and other critical materials.
 - b. Amounts and type of material disposed of.
 - c. Potential for ground water contamination.

*Company proposes
improved surveillance
instead of diking*

July 22, 1980

5. (Continued)

Please prepare a study plan for exploring these areas. This plan should be submitted to this office by August 31, 1980. Cleanup requirements (if any) will be based on the results of the exploration study.

As we discussed during the inspection, we will plan on meeting with your consultants to discuss waste treatment improvements and the oil disposal pit study plan in August.

If you have any questions prior to the meeting, please call.

Very truly yours,

WATER QUALITY DIVISION

JMT

James M. Turek,
Water Quality Specialist

JMT/mc

cc: J. Bohunsky
G. Boersen
W.Q.D. Files, Lansing